

Lesley E. Weaver (SBN 191305)  
BLEICHMAR FONTI & AULD LLP  
555 12th Street, Suite 1600  
Oakland, CA 94607  
Tel.: (415) 445-4003  
Fax: (415) 445-4020  
lweaver@bfalaw.com

Derek W. Loeser (admitted *pro hac vice*)  
KELLER ROHRBACK L.L.P.  
1201 Third Avenue, Suite 3200  
Seattle, WA 98101  
Tel.: (206) 623-1900  
Fax: (206) 623-3384  
dloeser@kellerrohrback.com

*Plaintiffs' Co-Lead Counsel*

*Additional counsel listed on signature page*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION

MDL No. 2843  
Case No. 18-md-02843-VC-JSC

This document relates to:

ALL ACTIONS

**DECLARATION OF LESLEY E.  
WEAVER IN SUPPORT OF  
ADMINISTRATIVE MOTION TO  
TEMPORARILY FILE UNDER SEAL  
PLAINTIFFS' SUBMISSION  
REGARDING DISPUTED SEARCH  
STRINGS**

I, Lesley E. Weaver, declare and state as follows:

1. I am an attorney licensed in the State of California and admitted to the United States District Court for the Northern District of California. I am the Partner-in-Charge of the California Office of Bleichmar Fonti & Auld LLP (“BFA”), Co-Lead Counsel for Plaintiffs in In re Facebook, Inc. Consumer Privacy User Profile Litigation, Case No. 18-md-02843-VC-JSC (the “MDL”), and a member in good standing of the bar of the State of California and of this Court.

2. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently to them. This declaration is made in support of Plaintiffs’ Administrative Motion to File Temporarily Under Seal Plaintiffs’ Submission Regarding Disputed Search Terms (“Submission”):

3. Attached hereto as Exhibit 1 is Plaintiffs’ Submission in unredacted form, including Exhibits A to O thereto, as described below:

- a. The seven pages comprising Exhibit A to Plaintiffs’ Submission, which consists of a chart that was created to aid in the parties’ negotiations about search terms and custodians, filtered and formatted for ease of reference. Exhibit A includes information about current and former Facebook employees and their corresponding knowledge regarding information Plaintiffs seek.
- b. The three pages comprising Exhibit B to Plaintiffs’ Submission, which consists of a chart that was created as a reference to the text of the requests for production of documents associated with the disputed search strings and custodians.
- c. The nine pages comprising Exhibit C to Plaintiffs’ Submission, Bates Numbered FB-CA-MDL-00203234 - FB-CA-MDL-00203242, which has been designated by Facebook as “Confidential” pursuant to the Protective Order.

- d. The four pages comprising Exhibit D to Plaintiffs' Submission, which consists of an excerpt of the 2013 PwC Report Bates numbered FB-CA-MDL-00149131 - FB-CA-MDL-0149208, which has been designated by Facebook as "Highly Confidential" pursuant to the Protective Order.
- e. The three pages comprising Exhibit E to Plaintiffs' Submission, which consists of an excerpt of the 2015 PwC Report Bates numbered FB-CA-MDL-00149213 - FB-CA-MDL-00149271, which has been designated by Facebook as "Highly Confidential" pursuant to the Protective Order.
- f. The three pages comprising Exhibit F to Plaintiffs' Submission, which consists of an excerpt of the 2017 PwC Report Bates numbered FB-CA-MDL-00149274 - FB-CA-MDL-00149326, which has been designated by Facebook as "Highly Confidential" pursuant to the Protective Order.
- g. The three pages comprising Exhibit G to Plaintiffs' Submission, which consists of an excerpt of the 2019 PwC Report Bates numbered FB-CA-MDL-00405233 - FB-CA-MDL-00405239, which has been designated by Facebook as "Highly Confidential" pursuant to the Protective Order.
- h. The seven pages comprising Exhibit H to Plaintiffs' Submission, Bates numbered PwC\_CPUP\_FB00000932, which has been designated by PricewaterhouseCoopers, LLC ("PwC") as "Confidential" pursuant to the Protective Order.
- i. The two pages comprising Exhibit I to Plaintiffs' Submission, Bates numbered PwC\_CPUP\_FB00000831 - PwC\_CPUP\_FB00000831, which has been designated by PwC as "Confidential" pursuant to the Protective Order.
- j. The page comprising Exhibit J to Plaintiffs' Submission, Bates numbered FB-CA-MDL-00203273, which has been designated by Facebook as "Confidential" pursuant to the Protective Order.

- k. The three pages comprising Exhibit K to Plaintiffs' Submission, which consists of an excerpt of the 2019 PwC Report Bates numbered FB-CA-MDL-00405233 - FB-CA-MDL-00405248, which has been designated by Facebook as "Highly Confidential" pursuant to the Protective Order.
- l. The two pages comprising Exhibit L, Bates numbered FB-CA-MDL-00183521 - FB-CA-MDL-0013522, which has been designated by Facebook as "Highly Confidential" pursuant to the Protective Order.
- m. The four pages comprising Exhibit M, Bates Numbered FB-CA-MDL-00151541- FB-CA-MDL-00151544 to Plaintiffs' Submission designated by Facebook as "Confidential" pursuant to the Protective Order.
- n. The page comprising Exhibit N to Plaintiffs' Submission, Bates numbered FB-CA-MDL-00166531, which has been designated by Facebook as "Highly Confidential" pursuant to the Protective Order.
- o. The four pages comprising Exhibit O to Plaintiffs' Submission, Bates Numbered FB-CA-MDL-00172517 - FB-CA-MDL-00172520, which has been designated by Facebook as "Confidential" pursuant to the Protective Order.

Pursuant to Civil Local Rule 79-5(d)(1)(C), a redacted version of Plaintiffs' Submission is not required as the Plaintiffs' seek to file the entirety of this document under seal.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct and to the best of my knowledge. This declaration was executed in Oakland, California.

Date: October 16, 2020

/s/ Lesley E. Weaver  
Lesley E. Weaver